

Docket No. PUR-020  
Serial No. 10/735,352

PATENT APPLICATION

REMARKS/ARGUMENTS

This is in full and timely response to the nonfinal Office Action dated March 20, 2007 (Paper No. 20070317). Reconsideration and withdrawal of the new grounds of rejection are respectfully requested in view of the above amendments and the following remarks.

By the foregoing amendment, independent claims 28 and 36 have been amended. Claims 2, 3, 5, 6, 24, 28, 29, 31, 32, 36, 37 and 51 remain pending in this application.

Claims 28 and 36 have been amended to delete certain language that was repeated in two places in the claims, and to make other minor clarifying changes. These changes are not believed to substantially change the scope of the claims, but will perhaps further clarify the Applicant's invention in a continuing effort to advance the prosecution of this application. If the Examiner has any other suggestions to further improve the language of the claims, he is encouraged to telephone the undersigned regarding the same.

Rejection of Claims 2, 3, 5, 6, 24, 28, 29, 31, 32, 36, 37 and 51 Under 35 U.S.C. 112

Claims 2, 3, 5, 6, 24, 28, 29, 31, 32, 36, 37 and 51 stand rejected under 35 U.S.C. 112, first and second paragraphs, for allegedly failing to comply with the enablement requirement, and failing to particularly point out and distinctly claim the invention. To the extent that these rejections might still be applied to the claims as amended, they are traversed for the following reasons.

The Examiner contends that independent claims 28, 36 and 51 contain subject matter

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which was not described in such a way as to enable one skilled in the art to make and/or use the invention, and which renders the claims indefinite. Specifically, the Examiner contends that the original specification fails to teach "how a group of filaments are arranged into a plane which is generally perpendicular to a longitudinal axis of a core member after the group of filaments pass through a guide member." The Applicant respectfully disagrees.

As explained in previous responses, this feature of the claimed invention is best shown in Fig. 15 of the Applicant's drawings and is described on page 12, lines 7 to 17 (paragraph 0044) of the original specification. The guide assembly 66 has a filament engaging surface 67 that lies in a plane generally perpendicular to a longitudinal axis of the core member 65. For example, as stated in lines 15 to 17, if the axis of rotation of the core member 65 is horizontal, the filament engaging surface 67 of the guide assembly 66 can extend along a vertical line.

As the filaments pass through the guide assembly 66, the filament engaging surface 67 causes the filaments to be arranged in the plane which is generally perpendicular to the longitudinal axis of the core member 65. This can be easily understood from Fig. 15 of the drawings, which shows the filament engaging surface 67 extending in a vertical direction, and the filaments 60 arranged one above the other as they pass through the guide assembly 66 (i.e., the filaments 60 are arranged in a vertical plane as they pass through the guide assembly 66). One of ordinary skill in the art can easily understand this aspect of the present invention. Indeed, a simple desk top experiment using pencils and two or more pieces of string can be conducted to confirm that filaments can be arranged and wound on a core member as shown in Fig. 15.

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The Examiner also contends that the original specification fails to state or teach "how filaments are caused (by a guide member) to be positioned side-by-side and packed tightly against one another as a group of filaments are wound onto a core member." Again, the Applicant respectfully disagrees.

The example illustrated in Fig. 15 provides a clear depiction of how a group of filaments 60 that are spaced apart as they pass over a filament engaging surface 67 of a guide assembly 66 are packed tightly against one another as they are wound onto a core member that extends perpendicular to the surface 67. A person of ordinary skill in the art will readily understand that as the group of filaments 60 are naturally reoriented from the filament engaging surface 67 to the surface of the core member 65, the filaments become closer together and are packed tightly against one another. The filaments 60, which are vertically spaced apart from one another as they pass through the guide assembly 66 (as depicted in Fig. 15), are all moved into the same horizontal plane by the time they reach the surface of the core member 65. As a result, the vertical spacing between the filaments 60 is totally eliminated and the filaments become positioned side-by-side in a horizontal plane and are packed tightly together. Of course, the terms "vertical" and "horizontal" are used only as one example in which the filament engaging surface 67 is generally perpendicular to the core member 65.

If the Examiner has any question or doubt about this feature working as shown and described in the original specification, he is encouraged to replicate the simple example shown in Fig. 15 and described in paragraph 0044. However, since this invention involves a highly

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predictable mechanical subject matter, it is respectfully submitted that a person of ordinary skill in the art would not have any difficulty understanding or being enabled to make and use the invention based on the original disclosure and the illustrated example.

Accordingly, the Examiner is requested to reconsider and withdraw the rejections under 35 U.S.C. 112, first and second paragraphs.

**Conclusion**

In view of the above, it is respectfully submitted that the claims are in full compliance with 35 U.S.C. 112, and that this application is now in condition for allowance. Early issuance of a Notice of Allowance is respectfully requested.

If the Examiner has any comments or suggestions that could place this application into even better form, the Examiner is encouraged to contact the Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted by:



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